

1 HONORABLE RICARDO S. MARTINEZ
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8 **UNITED STATES DISTRICT COURT**
9 **FOR THE WESTERN DISTRICT OF WASHINGTON**
10 **AT SEATTLE**

11 DERICK D'HAITI,
12 Plaintiff,

13 vs.

14 PHILIPS NORTH AMERICA LLC d/b/a
15 PHILIPS HEALTHCARE, a Delaware
16 limited-liability company; JONES LANG
17 LASALLE AMERICAS, INC., a Maryland
18 Corporation; ABM INDUSTRIES
19 INCORPORATED, a Delaware corporation;
ABC Company and XYZ Company,

Defendants.

NO. 2:20-CV-00358-RSM

STIPULATION AND PROPOSED
ORDER FOR WITHDRAWAL AND
SUBSTITUTION OF COUNSEL

TO: THE CLERK OF COURT

AND TO: ALL PARTIES AND COUNSEL OF RECORD

STIPULATION

The parties, by and through their respective counsel, hereby stipulate to the withdrawal
of David D. Mordekhov of Gardner Trabolsi & Mordekhov and Ramona N. Hunter of Wilson

STIPULATION AND PROPOSED ORDER FOR WITHDRAWAL
AND SUBSTITUTION OF COUNSEL – 1
Case: 2:20-CV-00358-RSM

032491.000013 D'Haiti C20-358 stip order subst cnsl

REED MCCLURE
ATTORNEYS AT LAW
FINANCIAL CENTER
1215 FOURTH AVENUE, SUITE 1700
SEATTLE, WASHINGTON 98161-1087
(206) 292-4900; FAX (206) 223-0152

1 Elser Moskowitz Edelman & Dicker, LLP as Attorneys of Record for Defendant(s) Jones LaSalle
2 Americas, Inc.

3 Further, the parties, by and through their respective counsel, hereby stipulate to the
4 withdrawal of Anthony R. Scisciani and Kelsey L. Shewbert as Attorneys of Record for Philips
5 North America d/b/a Philips Healthcare.

6 From this date forward, please send all pleadings, notice, calendars, and other
7 communication concerning this case for Jones Lang LaSalle Americas, Inc. **and** Philips North
8 America d/b/a Philips Healthcare to Jason E. Vacha, Reed McClure, 1215 Fourth Avenue, Suite
9 1700, Seattle, Washington 98164-1087.

10 WHEREAS, Plaintiff Derick D'Haiti represented by Donna L. Mack of Emerald Law
11 Group, PLLC, stipulates to the withdrawal of David D. Mordekhov of Gardner Trabolsi &
12 Mordekhov and Ramona N. Hunter of Wilson Elser Moskowitz Edelman & Dicker, LLP as
13 counsel of record for Jones Lang LaSalle Americas, Inc. **and** stipulates to the withdrawal of
14 Anthony R. Scisciani and Kelsey L. Shewbert as Attorneys of Record for Philips North America
15 d/b/a Philips Healthcare.

16 PER LCR 83.2, the undersigned counsel stipulates to the Withdrawal of David D.
17 Mordekhov and Ramona N. Hunter from this matter and the entry of Jason E. Vacha and the law
18 firm of REED McCLURE as counsel for Jones Lang LaSalle Americas, Inc. in this matter.

19 PER LCR 83.2, the undersigned counsel also stipulates to the Withdrawal of Anthony R.
20 Scisciani and Kelsey L. Shewbert from this matter and the entry of Jason E. Vacha and the law
21 firm of REED McCLURE as counsel for Philips North America d/b/a Philips Healthcare in this
22 matter.

STIPULATION AND PROPOSED ORDER FOR WITHDRAWAL
AND SUBSTITUTION OF COUNSEL – 2
Case: 2:20-CV-00358-RSM

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2 IT IS SO STIPULATED this 24th day of May, 2021.
3
4

5 REED McCLURE
6

7 /s/ Jason E. Vacha
8 Jason E. Vacha, WSBA #34069
9 Substituting Attorney for Defendant Jones Lang LaSalle
Americas, Inc. and Philips North America d/b/a
Philips Healthcare

10 GARDNER TRABOLSI & MORDEKHOV PLLC

11
12 /s/ David D. Mordekholv
13 David D. Mordekholv, WSBA #32900
Withdrawing Attorney for Defendant Jones Lang LaSalle America, Inc.

14 WILSON ELSER MOSKOWITZ
15 EDELMAN & DICKER, LLP

16
17 /s/ Ramona N. Hunter
18 Ramona N. Hunter, WSBA #31482
Withdrawing Attorney for Defendant Jones Lang LaSalle America, Inc.

19 HOLT WOODS & SCISCIANI, LLP

20
21 /s/ Kelsey L. Shewbert
22 Anthony R. Scisciani III, WSBA #32342
Kelsey L. Shewbert, WSBA #51214
23 Withdrawing Attorneys for Philips North America LLC d/b/a Philips Healthcare

24
25 STIPULATION AND PROPOSED ORDER FOR WITHDRAWAL
AND SUBSTITUTION OF COUNSEL – 3
Case: 2:20-CV-00358-RSM

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EMERALD LAW GROUP, PLLC

/s/ Donna L. Mack

Donna L. Mack, WSBA #30875
Attorney for Plaintiff

ORDER

Based upon the above Stipulation, it is hereby ORDERED, ADJUDGED, and DECREED that David D. Mordekhov of Gardner Trabolsi & Mordekhov and Ramona N. Hunter of Wilson Elser Moskowitz Edelman & Dicker, LLP are hereby withdrawn as counsel for Defendant Jones Lang LaSalle Americas, Inc. in this matter and that Anthony R. Scisciani and Kelsey L. Shewbert are hereby withdrawn as counsel for Philips North America d/b/a Philips Healthcare, AND, that Jason E. Vacha substitutes as the attorney of record for Defendants Jones Lang LaSalle Americas, Inc. and Philips North America d/b/a Philips Healthcare.

DATED this 26th day May, 2021.



RICARDO S. MARTINEZ
CHIEF UNITED STATES DISTRICT JUDGE

**STIPULATION AND PROPOSED ORDER FOR WITHDRAWAL
AND SUBSTITUTION OF COUNSEL - 4**

Case: 2:20-CV-00358-RSM

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1 Presented by:

2 REED McCLURE

4 */s/ Jason E. Vacha*

5 Jason E. Vacha, WSBA #34069

6 *Substituting Attorney for Defendant Jones Lang LaSalle Americas, Inc.*
and Philips North America d/b/a Philips Healthcare

7 GARDNER TRABOLSI & MORDEKHOV PLLC

9 */s/ David D. Mordekhov*

10 David D. Mordekhov, WSBA #32900

11 *Withdrawing Attorney for Defendant Jones Lang LaSalle America, Inc.*

12 WILSON ELSER MOSKOWITZ
EDELMAN & DICKER, LLP

14 */s/ Ramona N. Hunter*

15 Ramona N. Hunter, WSBA #31482

16 *Withdrawing Attorney for Defendant Jones Lang LaSalle America, Inc.*

17 HOLT WOODS & SCISCIANI, LLP

18 */s/ Kelsey L. Shewbert*

19 Anthony R. Scisciani III, WSBA #32342

20 Kelsey L. Shewbert, WSBA #51214

21 *Withdrawing Attorneys for Philips North America LLC d/b/a Philips Healthcare*

22 EMERALD LAW GROUP, PLLC

24 */s/ Donna L. Mack*

25 Donna L. Mack, WSBA #30875

25 Attorney for Plaintiff

STIPULATION AND PROPOSED ORDER FOR WITHDRAWAL
AND SUBSTITUTION OF COUNSEL – 5

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STIPULATION AND PROPOSED ORDER FOR WITHDRAWAL
AND SUBSTITUTION OF COUNSEL – 6
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2 **CERTIFICATE OF SERVICE**
3
4
5

6 I hereby certify that on May 25, 2021, I electronically filed the foregoing with the Clerk
7 of the Court using the CM/ECF system which will send notification of such filing to the
8 following:
9

10 Donna L. Mack
11 Emerald law Group, PLLC
12 811 First Avenue, #510
13 Seattle, WA 98104
14 (206) 826-5160
15 donna@emeraldlawgroup.com

16 Anthony R. Scisciani, III
17 ascisciani@hwslawgroup.com
18 jheath@hwslawgroup.com

19 Kelsey Lynn Shewbert
20 kshewbert@hwslawgroup.com
21 ckramer@hwslawgroup.com
22 kshewbert@gmail.com

23 David D. Mordekhov
24 Gardner Trabolsi & Mordekhov, PLLC
25 2200 Sixth Avenue, #600
1 Seattle, WA 98121
2 (206) 256-6309
3 dmordekhov@gandtlawfirm.com

4
5 and I hereby certify that I have mailed by United States Postal Service the document to the
6 following non-CM/ECF participants:
7
8

9 *N/A*

10 DATED: May 25, 2021.

11 _____
12 /s/ Carolyn Lafferty
13 Carolyn Lafferty

14
15 STIPULATION AND PROPOSED ORDER FOR WITHDRAWAL
16 AND SUBSTITUTION OF COUNSEL – 7
17 Case: 2:20-CV-00358-RSM

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